

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO**

JOHN NOAKES,

Plaintiff,

vs.

UNIVERSITY OF CINCINNATI, *et al.*,

Defendants.

: **Case No. 1:23-cv-00284**
:
: **Judge Michael R. Barrett**
:
:
:
:
:
:
:
:

**UNOPPOSED MOTION TO AMEND JOINT PLAN FOR LIMITED DISCOVERY
REGARDING MOTION FOR PRELIMINARY INJUNCTION**

Defendants University of Cincinnati, Alecia Trammer, Adrienne Lyles, Bleuzette Marshall, and Ashleigh Wade (“Defendants”) respectfully move the Court to amend the Joint Plan for Limited Discovery Regarding Motion for Preliminary Injunction (Doc. 15) as follows:

1. Defendants may file an Opposition to the Motion for Preliminary Injunction by September 15, 2023.
2. Plaintiff may file a Reply to the Opposition to the Motion for Preliminary Injunction by September 29, 2023.

Good cause exists for the extension because the parties received several deposition transcripts on September 7, 2023, and need additional time to incorporate the testimony in those transcripts into their filings. Counsel for Plaintiff has been consulted on this request and has stated that he does not oppose this motion.

Accordingly, Defendants respectfully request that the Court amend the Joint Plan for Limited Discovery Regarding Motion for Preliminary Injunction to extend the filing deadlines in the manner requested above.

Respectfully submitted,

/s/ Dominick S. Gerace

Dominick S. Gerace (0082823)

Jada M. Colon (0099048)

Taft Stettinius & Hollister LLP

425 Walnut Street, Suite 1800

Cincinnati, Ohio 45202-3957

Telephone: (513) 381-2838

Fax: (513) 381-0205

dgerace@taftlaw.com

jcolon@taftlaw.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on September 8, 2023 a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties in this case by operation of the Court's CM/ECF system. Parties may access this filing through the Court's system.

/s/ Dominick S. Gerace